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MEMO ENDORSED

Via ECF

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December 2, 2021

Honorable Valerie E. Caproni
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, New York 10007

Re: Shanghai Shuoxin International Co., Ltd. v. Jordache Enterprises Inc.
(1:21-cv-05825-VEC)

Dear Judge Caproni:

We represent defendant Jordache Enterprises, Inc. ("Jordache") in the above-referenced action. This letter is submitted jointly with counsel for plaintiff Shanghai Shouxin International Co. Ltd. ("SSI"). Pursuant to Rule 2(C) of Your Honor's Individual Practices, the parties respectfully request an adjournment of the Initial Pretrial Conference, currently scheduled for December 10, 2021 at 1:00 p.m. The parties make this request to allow the parties to continue to focus on settlement efforts at this time.

As we reported in our prior letters to Your Honor (ECF Docs. 16, 19), the parties are working to reach an amicable resolution to this matter before incurring substantial legal fees and costs in connection with amended pleadings and discovery. Since our last update, SSI has provided additional information on its claimed damages to Jordache, and the parties have scheduled a physical inspection of the materials in inventory at SSI's warehouse in China in early December. In light of these ongoing settlement efforts, we respectfully request an adjournment of the Initial Pretrial Conference, currently scheduled for December 10, 2021 at 1:00 p.m., and the corresponding deadline to submit a joint proposed Case Management Plan and joint letter setting forth the factual and legal bases of claims and defenses. We respectfully propose that the Initial Pretrial Conference be adjourned to Friday, January 14, 2022 or January 21, 2022. This is the fourth request for an adjournment of the conference.

We thank the Court for its attention to this matter.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Sara J. Crisafulli'.

Sara J. Crisafulli

cc: All Counsel of Record (via ECF)

Application GRANTED. The conference currently scheduled for December 10, 2021, at 1:00 p.m. is hereby ADJOURNED until **January 14, 2022, at 1:00 p.m.** The parties must submit a joint letter ahead of the conference not later than January 6, 2022, *see* Dkt. 11. The Court will not grant any further adjournments.

SO ORDERED.

 12/3/21

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE